

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE
REDIRECTED FROM WITNESS MOELLER
(UPS/USPS-T28-34 AND 42)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-T28-34 and 42, filed on November 29, 2001.

The interrogatories have been redirected from witness Moeller to the Postal Service for response.

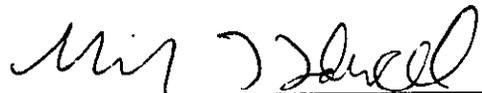
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



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December 13, 2001

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF UNITED PARCEL SERVICE**

UPS/USPS-T28-34. Refer to the Postal Service's response to interrogatory DFC/USPS-6(a).

(a) Provide a breakdown of the PETE data, % On Time Overnight Commitment and % On Time 2-Day Commitment, separately for FY1998, FY1999, FY2000, and FY2001, for:

- (i) Priority Mail flats; and
- (ii) Priority Mail Parcels.

(b) Provide a breakdown of the ODIS data, % On Time Overnight Commitment and % On Time 2-Day Commitment, separately for FY1998, FY1999, FY2000, and FY2001, for:

- (i) Priority Mail flats; and
- (ii) Priority Mail Parcels.

RESPONSE:

a. Data are not available for this split. The system is not designed to derive statistically reliable data for parcels at this level.

b. **ORIGIN-DESTINATION INFORMATION SYSTEM
PRIORITY MAIL SERVICE STANDARD REPORT
FLATS & PARCELS, OVERNIGHT & TWO-DAY
NATIONAL, FY1998 thru FY2001**

<i>FISCAL YEAR</i>	<i>SERVICE STANDARD</i>	<i>SHAPE</i>	<i>** SSA SCORES **</i>	
			<i>One-Day</i>	<i>Two-Days</i>
1998	OVERNIGHT	FLATS	84	
1998	OVERNIGHT	PARCELS	85	
1998	TWO-DAY	FLATS		70
1998	TWO-DAY	PARCELS		73
1999	OVERNIGHT	FLATS	85	
1999	OVERNIGHT	PARCELS	86	
1999	TWO-DAY	FLATS		72
1999	TWO-DAY	PARCELS		75
2000	OVERNIGHT	FLATS	83	
2000	OVERNIGHT	PARCELS	85	
2000	TWO-DAY	FLATS		70
2000	TWO-DAY	PARCELS		73
2001	OVERNIGHT	FLATS	81	
2001	OVERNIGHT	PARCELS	82	
2001	TWO-DAY	FLATS		66
2001	TWO-DAY	PARCELS		69

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
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UPS/USPS-T28-42. Describe all factors which make Priority Mail more difficult to process and handle than First Class Mail, including Postal Service operations, content restrictions, available automation, machinability, weight and dimensional differences, and average cube size.

RESPONSE:

Mail of various sizes and service standards may travel through different mailflows (see, generally, witness Kingsley's testimony (USPS-T-39) for a description of mail processing). It is not clear what is meant by "more difficult." Obviously, flat and parcel sorting operations are more costly than letter sorting operations (due to factors such as automation availability, machinability, weight and dimensional differences, and cube), but that does not make them "more difficult" necessarily. The higher costs of certain processing types are reflected in the costs and the rates for the products processed through those operations.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in black ink, appearing to read "Michael T. Tidwell", written over a horizontal line.

Michael T. Tidwell

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